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*Attorneys for Defendant  
Blue Cross and Blue Shield of North Carolina*

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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION (SOUTHERN REGION)**

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N.E., individually and on behalf of H.E. a  
minor,

Plaintiffs,

v.

BLUE CROSS BLUE SHIELD OF  
NORTH CAROLINA,

Defendant.

Case No. 4:21-cv-00056-DN-PK

***EX PARTE* MOTION FOR LEAVE TO  
FILE OVERLENGTH MOTION TO  
TRANSFER VENUE**

Judge David Nuffer

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Defendant Blue Cross Blue Shield of North Carolina (“Blue Cross NC”), through its undersigned counsel and under DUCivR 7-1(e), hereby moves the Court for leave to file an overlength Motion to Transfer Venue that is 13 pages, excluding the face sheet, tables of contents, signature block, certificate of service, and exhibits. In support of this request, Blue Cross NC represents as follows:

1. Blue Cross NC finds it necessary to exceed the page limit set forth in DUCivR 7-1(e)(3) by two-and-a-half pages in order to properly analyze the caselaw and arguments for

transferring venue.

2. Blue Cross has attempted to address these issues as succinctly as possible, and believes its request to file an overlength motion is for good cause and under exceptional circumstances.

3. Blue Cross NC represents that its Motion will contain no more than 13 pages, excluding the face sheet, tables of contents, signature block, certificate of service, and exhibits.

Accordingly, Blue Cross NC requests that the Court approve its overlength Motion. A proposed order is attached as Exhibit A to this Motion and will be sent separately to the Court in Word format.

Dated: August 11, 2021.

/s/ Larissa Lee  
Mark D. Tolman  
Larissa Lee  
JONES WALDO HOLBROOK & McDONOUGH PC  
*Attorneys for Blue Cross NC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of August, 2021, I caused a true and correct copy of the foregoing to be delivered via the Court's electronic filing system to the following:

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Brent J. Newton  
Samuel M. Hall  
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/s/ Shelley Proctor

# Exhibit A